

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

MICHAEL DISABATO	)	Case No. 2:19-cv-02237
AND JOHN DOES 1-36,	)	
	)	Judge Michael H. Watson
Plaintiffs,	)	
	)	Chief Magistrate Judge Elizabeth P.
v.	)	Deavers
	)	
THE OHIO STATE UNIVERSITY,	)	
	)	
Defendant.		

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO PROCEED ANONYMOUSLY**

Plaintiffs hereby move the Court for an order permitting John Does 1-36 to proceed anonymously in this action in a manner identical to that approved by the Court in related cases. *See* Case No. 2:18-cv-00692, (“*Garrett*”), *Doc. 67*; *Case No 2:18-cv-00736, Doc. 49* (“*Snyder-Hill*”). Defendant does not oppose Plaintiffs’ Motion at this time, but reserves its right to revisit the request for anonymity if subsequent case developments indicate otherwise to Ohio State.

The above-referenced orders in *Garrett* and *Snyder-Hill* properly balance Plaintiffs’ privacy interests with Defendant’s need to know the identities of the John Doe Plaintiffs. Accordingly, the Parties submit the attached proposed order, which is consistent with the above-referenced orders except for the following changes:

1. Alexandra T. Schimmer and Ryan Meadows are no longer listed as persons at Ohio State to whom the identities of the John Doe plaintiffs may be disclosed. Ms. Schimmer is no longer employed at Ohio State, and Mr. Meadows is in a different position at Ohio State.
2. Anne Schira has replaced Mr. Meadows and is listed as a person at Ohio State to whom the identities of the John Doe Plaintiffs may be disclosed.
3. Kellie Brennan’s title has changed.
4. Amy Golian has been added as a person at Ohio State to whom the identities of the John Doe plaintiffs may be disclosed.

For the foregoing reasons, Plaintiffs request their Motion be granted.

Respectfully submitted,

/s/ Michael L. Wright

**Michael L. Wright (0067698)** (Trial Attorney)

**Robert L. Gresham (0082151)**

**Wright & Schulte, LLC**

130 W. 2nd Street, Suite 1600

Dayton, OH

(937) 435-7500

(937) 435-7511 (fax)

mwright@yourohiolegalhelp.com

rgresham@yourohiolegalhelp.com

/s/ Dennis P. Mulvihill

**Dennis P. Mulvihill (0063996)**

**Wright & Schulte, LLC**

130 W. 2nd Street, Suite 1600

Dayton, OH

(937) 435-7500

(937) 435-7511 (fax)

/s/ Richard W. Schulte

**Richard W. Schulte (0066031)**

**Wright & Schulte, LLC**

865 S. Dixie Dr.

Vandalia, OH 45377

(937) 435-9999

(937) 435-7511 (fax)

/s/ Warren N. Sams III

**Warren N. Sams III (Ga. Bar 624440)**

**The Sams Law Firm**

1000 Parkwood Circle, STE 220

Atlanta, GA 30339

(404) 420-0291

(404) 420-0292 (fax)

Counsel for the Plaintiffs